

## **Exhibit M**

## **Estate of Owen Thomas Carlock**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

JOHNN BASCI, et al.,

**AFFIDAVIT OF  
SHIRLEY JEAN CARLOCK**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY )

: SS.:

COUNTY OF MONMOUTH)

SHIRLEY JEAN CARLOCK, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 39 Crest Road, Middletown, New Jersey 07748.

2. I am currently 63 years old, having been born on March 8, 1959.

3. I am the wife of Owen Thomas Carlock, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.

4. My husband passed away from respiratory disease on May 23, 2012 at the age of 58. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On June 19, 2012, I was issued Letter of Administration on behalf of my husband's estate by the Monmouth County Surrogate's Court, State of New Jersey.

6. Owen and I shared a true partnership. We did everything together. Every decision we made, we made as a couple. We loved to vacation whenever we could, and enjoyed going out on dinner dates. We worked hard to maintain our home and raise our children. It was a beautiful

marriage.

7. I remember 9/11 as clear as day. We had just moved into a new home, and it was picture day at school for our daughter. She wanted her hair to be perfect for pictures, and insisted Owen be the one to help her. This caused him to be late to work. His being late to work meant that he had to ride with the engine company. They also were running behind and late getting to the World Trade Center. They arrived as the first tower started to come down. Owen hid in an alcove by the Deutsche Bank building and pulled six firemen into the alcove with him. He saved their lives. The alcove spared their lives, but did not spare them from being covered in soot and debris. I didn't see Owen again until three or four days later. He insisted on staying and doing whatever was necessary to help find possible survivors. When he finally got home, I saw an immediate change in him. He had lost the spark in his eye. He told me all the things that he witnessed and went through and said that he could never speak of those things again. It was a horrific day.

8. The changes in Owen were evident from the second he got home from the WTC. He became withdrawn, and his outlook on life changed. Instead of looking toward the future he only saw a "ten-year plan" for himself. He saw a countdown clock on his life that followed him everywhere. His mental state was in a constant decline. He was always sad. Owen was no longer the happy-go-lucky man I once knew who was always laughing and smiling. That Owen was gone. He was now very serious, rarely smiled, and hardly ever laughed. Losing so many of his comrades, and whatever other atrocities he witnessed on 9/11, had cut away a piece of his soul and sucked him into a deep depression. He had a severe case of PTSD. Soon thereafter, Owen developed a constant cough that would often lead to vomiting. He had chronic bronchitis and sleep apnea. His doctor said Owen's sleep apnea was one of the worst cases he had ever seen. He had to use a CPAP machine at night. To me, Owen never appeared to be healthy again. He was always nauseous and constantly had to excuse himself from family dinners to vomit because he couldn't hold food down. His illness put a great strain on his heart, which ultimately lead to his heart attack and death.


9. Owen passed away while he was on vacation with some of his FDNY friends. He suffered a severe respiratory event which led to a heart attack. Two hours later, he was gone. When I got the call, I was completely devastated. It was surreal to me that my husband went on vacation, and I never saw him alive again.

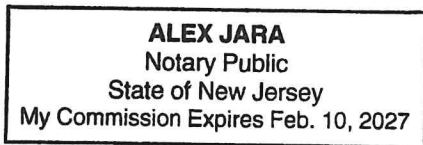


10. Owen was loved by everybody. Not one person ever had a bad word to say about him. He was so well respected. At his wake, there was a constant flow of people coming in to pay their respects. Even people who he had only met once or twice in his life came to his wake. The outpouring of people was truly remarkable. I often think of that quote from *It's a Wonderful Life*, "No man is a failure who has friends." That was Owen. He was a truly remarkable man who was taken from those who loved him, and from this world, much too soon.

  
SHIRLEY JEAN CARLOCK

Sworn to before me this  
5 day of May, 2022

  
Notary Public



## **Estate of James Nicholas Costello**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
JOHNN BASCI, et al.,

**AFFIDAVIT OF**  
**JOAN PATRICIA COSTELLO**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY )

: SS.:

COUNTY OF SUSSEX )

JOAN PATRICIA COSTELLO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 58 Andover Road, Sparta, New Jersey 07871.

2. I am currently 81 years old, having been born on March 23, 1941.

3. I am the mother of James Nicholas Costello, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my son's estate.

4. My son passed away from pancreatic cancer on November 25, 2015. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On January 25, 2016, I was appointed personal representative of my son's estate by the State of New Jersey, Monmouth County Surrogate's Court.

6. James (Jimmy) was a wonderful person. He made everything better by his presence. If he gave you a gift, it was always something extra special and thoughtful. Jimmy and I had a very close relationship as mother and son. We would call each other and talk all the

time. He was very devoted to the FDNY, which kept him busy. In 2012, Jimmy bought a house down the Jersey Shore. It was destroyed by Hurricane Sandy. When he wasn't working, he was busy fixing up his home. Jimmy was very private about certain aspects of his life, and because of that, I did not know about his cancer until it was too late. I have a hard time understanding whether he knew he was ill.

7. Jimmy worked for the FDNY and responded to the World Trade Center site about a week after September 11<sup>th</sup>. He spent approximately one month down there, performing search and recovery operations on the pile. It was truly a terrible thing for him to experience because so many of his friends had died in the attacks. Jimmy knew 150 of the 343 firemen who passed. I can't even imagine how hard it was for him to work every day in the graveyard of his friends. He attended all of their funerals and became a special friend to their families in their time of sorrow. Jimmy was asked by the FDNY to write the 9/11 Report. He had to detail every firehouse's participation and a minute-by-minute account of their responses to the scene. The project took years, and Jimmy couldn't get away from thinking about 9/11 and the deaths of his friends. It was a source of great sorrow for him.

8. I knew for a long time that Jimmy had suffered from GERD (Gastro-Esophageal Reflux Disease) as a result of his exposure at Ground Zero. He told me that he had to cancel a few ski trips that he was planning because his GERD was acting up. He would suffer from symptoms like stomach discomfort and gastric reflux. Otherwise, he was a healthy person and worked hard to stay fit and active. The last time I saw Jimmy, in September 2015, I noticed that he had lost weight, but overall, he looked fine. I had no idea that he was seriously ill. I didn't see him very much between September 2015 and his death in November 2015, but we spoke on the phone often. He would have coughing fits during our phone conversations, which started to concern me. I told him to see a doctor because I thought that maybe he had pneumonia. I had no idea that Jimmy was suffering from neuroendocrine pancreatic cancer.

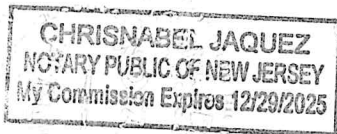
9. To my knowledge, Jimmy didn't have any treatment for his cancer. If he did, he didn't share that with me. If he knew about his illness beforehand, he kept it close to the vest and chose to suffer in silence. I am sure there were signs that we didn't pick up on. It wasn't until he passed away that we learned that he had been suffering from pancreatic cancer. It broke my heart. It was awful enough that Jimmy was in constant pain due to his persistent cough.

10. Jimmy's presence was filled with joy and love. He was a wonderful person who suffered a lot of anguish following 9/11, and he suffered his illness in silence. My heart aches to know that he didn't let us in to help him because he wanted to spare us. My Jimmy is sorely missed every day.

  
JOAN PATRICIA COSTELLO

Sworn to before me this  
13 day of May, 2022

  
Notary Public



**Estate of John Charles Devlin**

5. On June 18, 2015, I was appointed personal representative of John's estate in the Surrogate's Court of the State of New York, Suffolk County.



6. John and I were inseparable. We did everything together and were very involved in our children's lives. We were constantly taking them to whichever sport was in season and attended every game. Traveling was one of our favorite activities. We had a mutual love for skiing. John and I had a very full life.

7. Following 9/11, the operating engineers were the first ones to come in after the first responders to help with the clean-up. John was among them. John had been on the pile for 9 or 10 months, during which time he saw many horrific and graphic things. Breathing in the many carcinogens at the World Trade Center site for such a prolonged period of time ultimately led to him developing Stage IV throat cancer. Seeing severed body parts led to him having severe PTSD. Despite the daily horror, John continued to work and did what he had to do.

8. It was late 2008 when John began to have issues with his throat. He was always complaining about his throat. Around Thanksgiving, he decided to go to the doctor to get an injection to get rid of a throat infection. The injection had little effect, so we took him to the World Trade Center Health Program at Stony Brook for lab work. By February of 2009, Stony Brook recommended that John see an ENT. He was then diagnosed with Stage IV inoperable throat cancer. Thirty-three radiation treatments and four chemotherapy treatments ravaged his body. These treatments depleted his white blood cell count and forced him to be on a feeding tube. He would remain on a feeding tube for the remainder of his life. He quickly went from being a strong man weighing 230 lbs. to a weak man weighing only 100 lbs.

9. The extreme weight loss John experienced took not just a physical toll on him but a mental toll as well. He looked in the mirror and no longer saw himself. He lost all feelings of masculinity due to his weight loss and hair loss. John changed in all senses. Knowing he couldn't do the things he wanted to do anymore sent him spiraling through the five stages of grief. John was angry for a long time, and then depressed. He was anxious, and by the end became reclusive. Knowing there was nothing he could do destroyed him.

10. John left a wonderful legacy for my children. He was a strong man with a heart of gold who regularly worked with the FealGood Foundation. He was an amazing role model and a

great father. He is sorely missed every day. Losing John was a really tough time in all of our lives.

Nancy Marie Bukowski - Strandin  
NANCY MARIE BUKOWSKI-STRANDIN

Sworn to before me this  
9<sup>th</sup> day of May, 2022

Nichole M. Moore  
Notary Public



NICHOLE M. MOORE  
Notary Public, State of Ohio  
My Commission Expires:  
Aug. 24, 2026

## **Estate of Mark Harris**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
JOHNN BASCI, et al,

Plaintiffs,

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF FLORIDA )

COUNTY OF VOLUSIA )

: SS.:

**AFFIDAVIT OF**  
**BRANDI MARLA HARRIS**

20-CV-00415 (GBD)(SN)

BRANDI MARLA HARRIS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 582 Good Life Way, Daytona Beach, Florida 32124.
2. I am currently 57 years old, having been born on February 18, 1965.
3. I am the wife of Mark Harris, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.
4. Mark passed away from tongue cancer on May 13, 2017, at the age of 54. It has been medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. On December 20, 2017, I was issued Letters Testamentary on behalf of my husband's estate by the Circuit Court for Palm Beach County, Florida – Probate Division.

6. Mark and I first met each other when I was just six months years old. He was playing monopoly with my brother at our house, and I was crying in my crib. Little did he know then that that fussy baby would one day be his wife. We started dating when I was twelve years old. Mark and I were married for thirty-six years and had four children together. He was a loving husband and father.

7. Mark started his career as an FDNY firefighter at a young age. He loved his job and never once thought about changing his career. Mark was a fearless and selfless human being. Even after 9/11, he continued to work for the fire department. He once told me that if there was another attack like 9/11, he would again try to rescue as many people as possible without hesitation.

8. On September 11<sup>th</sup>, Mark helped to rescue seventy-eight people out of the World Trade Center. He was standing in front of the South Tower when it collapsed. He was buried under the rubble of Tower 2 for nine hours. The heat was so intense in the air pocket where Mark was trapped that he lost both of his corneas when he removed his contact lenses. After Mark was rescued, he suffered from back and neck pain.

9. Despite Mark's injuries, he continued with the search and recovery efforts. Mark cleaned debris from the collapsed buildings. He also searched for the remains of victims in the Fresh Kills landfill. After Mark retired from the FDNY in 2009, we moved to Florida, and Mark continued to work as a firefighter.

10. Mark had trouble breathing properly after 9/11. The doctors found ground glass particles in his lungs. Mark's breathing problems got worse over time. His lungs went down to 28% functionality, and he could not breathe without an oxygen tank.



11. In 2014, Mark was diagnosed with thyroid cancer. He went to the hospital every six months for routine checkups. In September 2016, Mark developed a sore in his mouth and a painful toothache. Within a few days of going to the hospital, Mark's doctor confirmed that he had tongue cancer, which eventually spread to his mouth, jaw, and brain.

12. Mark underwent chemotherapy five days a week and radiation treatment for his cancer. His tongue had to be completely removed and reconstructed by grafting the skin and veins from his arms. He never regained the use of his arms after the surgery. Later on, we found out that Mark also had Hodgkin's Lymphoma. He was always either sweating profusely or shaking from chills. Mark suffered mild heart attacks almost every week after starting his chemotherapy. He was hospitalized for a very long time. The doctors struggled to figure out how to treat the rapid spread of his cancer.

13. Mark had no quality of life after his surgeries. He lost all of his teeth and required a feeding tube for over a year. He had to re-learn how to eat, speak, and drink. He started losing his memory. Mark became depressed and questioned why God had punished him after committing his life to public service. He struggled to make sense of what was happening to him. He confided in me that he would rather have died on 9/11 than suffer from the cancer every day. Mark did not want to pass away at the hospital, so we moved him back home as soon as we could. In 2014, I quit my job and became Mark's full-time caretaker.

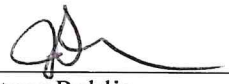
14. Despite the severity of Mark's cancer, he fought as hard as he could to stay alive. He was always telling me that he had no regrets in his life. When Mark's doctor told me that he only had 10 days to live, I could not bear to tell Mark. Before Mark passed away, he was planning a trip to Greece. I had to cancel his reservations because I knew he would not be able to

make that trip. Mark agreed to undergo another round of chemotherapy so that he could attend our daughter's wedding. He sadly passed away before then.

15. Mark's remains were cremated, and his ashes were spread into the sea near the island of Mykonos, Greece. Mark was the love of my life, and my children and I will never forget the impact he had on our lives. We miss him every day.

  
BRANDI MARLA HARRIS

Sworn to before me this  
18<sup>th</sup> day of May, 2022

  
Notary Public



**Joseph Cronin**  
**State of Florida**  
**My Commission Expires 10/26/2023**  
**Commission No. GG 926961**



**Estate of Gwyne K. MacPherson-Williams**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
JOHNN BASCI, et al.,

**AFFIDAVIT OF**  
**GREGORY A. WILLIAMS**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK                    )  
                                              : SS.:  
COUNTY OF WESTCHESTER            )

GREGORY A. WILLIAMS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 130 Pelham Road, #7D, New Rochelle, New York 10805.

2. I am currently 74 years old, having been born on May 22, 1947.

3. I am the husband of Gwynne K. MacPherson-Williams, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my wife's estate.

4. My wife passed away from pancreatic cancer on March 25, 2011, at the age of 57. It was medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On May 2, 2011, I was appointed personal representative of my wife's estate in the New York Surrogate's Court, Westchester County.

6. Gwynne and I lived together since 1980. We ultimately got married and had a son in 1991. We spent every day together until her death. We enjoyed many things, including vacationing, date nights, going out to dinner, hosting dinner parties, and having family dinners at

home. Every day, I would take her to the train station in the morning and pick her up in the evening when she returned home from work. We did everything a happy family would do.

7. On September 11, 2001, Gwynne was at work at 26 Federal Plaza. She was the District Deputy Director of Immigration and Naturalization for the Department of U.S. Citizenship and Immigration Services (USCIS). Following the attacks, Gwynne escaped by running uptown. She became coated in dust from being so close to the crash site. Since all transportation had been stopped, she had to walk uptown from lower Manhattan to 59<sup>th</sup> Street to walk across a bridge. She returned to work about two weeks after 9/11. She continued to work for USCIS at 26 Federal Plaza until she was forced to retire due to her medical condition.

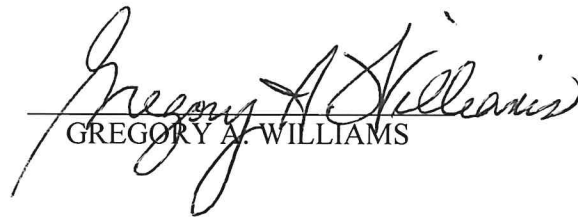
8. In June 2010, Gwynne started to feel some pain in her lower back. I took her to the doctor right away. After some testing, she was diagnosed with Stage IV pancreatic cancer. Gwynne was generally in good health, so this diagnosis took us completely by surprise. She started treatment right away and had to have a port inserted for chemotherapy. I took her to a facility in Westchester that specialized in rare cancers on a frequent basis for her chemotherapy treatments.

9. Gwynne suffered many of the effects of pancreatic cancer. She had a constant backache, as well as nausea, constipation, and indigestion. She lost weight, as she had a hard time eating and digesting. She also suffered many of the uncomfortable side effects of chemotherapy. Near the end of her life, Gwynne also experienced mental and emotional changes related to her illness. She became increasingly anxious and confused. As her partner, it was very difficult to watch her condition deteriorate.


10. Gwynne's illness also impacted our family's financial situation. Gwynne had to go on disability when she became sick, so our family income decreased. I also had to assume responsibility for many of the household tasks that Gwynne would normally do.

11. Gwynne should not have become sick and died from this illness. She was a loving wife and mother, and a dutiful employee to the USCIS. She returned to work in the exposure zone, without fail and as a loyal civil servant. She worked for 38 years for her agency. She went

to work knowing there were risks involved. She should not have had to suffer and sacrifice her life in this way.

  
GREGORY A. WILLIAMS

Sworn to before me this  
20<sup>th</sup> day of May, 2022

  
Notary Public

ERNEST B. BOLDEN  
Notary Public, State of New York  
No. 60-0345650  
Qualified in Westchester County  
Commission Expires March 30, 2023

## **Estate of Marilyn Mucaria**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
JOHNN BASCI, et al.,

**AFFIDAVIT OF**  
**JOSEPH MUCARIA**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK     )  
                                  : SS.:  
COUNTY OF QUEENS     )

JOSEPH MUCARIA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 81-04 45<sup>th</sup> Avenue, Elmhurst, New York 11373.

2. I am currently 68 years old, having been born on November 24, 1953.

3. I am the husband of Marilyn Mucaria, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my wife's estate.

4. My wife passed away from lung cancer on December 2, 2014. It was medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. On July 6, 2015, I was appointed personal representative of my wife's estate in the Surrogate's Court of the State of New York, Queens County.

6. Marilyn and I had a wonderful life together. She was my lover and best friend. We did many things together. We went shopping, to the movies, to restaurants, and took walks in the park. We loved to spend time together.



7. On 9/11, Marilyn worked at One Police Plaza for the New York Police Department. She was a secretary for the Chaplain Unit. Marilyn was in her office when the first plane hit the World Trade Center. She went outside to see what had happened, and that's when the second plane hit the towers. She immediately left work and got on the train to come home. She was so happy and relieved to get home safe that day. She took a few days off from work, but the NYPD was mandated to return to work as soon as possible, so she was in the office shortly after.

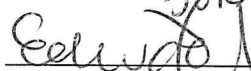
8. Marilyn developed a dry cough in March 2014, which she ignored. I was sick at the time, so Marilyn was taking care of me. She wasn't worrying as much about her own health. She began coughing up blood in May 2014 and had a lung biopsy in July 2014. Marilyn was diagnosed with metastatic squamous cell carcinoma. By the time she was diagnosed, she was showing even more signs of illness, such as significant fatigue and weight loss. The doctors explained to me that Marilyn's lung cancer was terminal. It brought me to tears—there was nothing I could do.

9. She went in for radiation and chemotherapy, but her cancer was too advanced for any treatments to work. They couldn't operate on her because her cancer was too far along. She was getting sicker and sicker, and she wasn't getting any better. The cancer spread to her brain and made her forgetful. We would go out to restaurants, and she wouldn't know where she was. She was an intelligent person, but once the cancer spread to her brain, it took a toll on her. As her illness progressed, she couldn't do much for herself. She never complained and just suffered in silence. But her pain was evident. She just slowly faded away from the person she was before.

10. Marilyn was simply doing her job—a job she loved. She didn't deserve to develop such a terrible disease and suffer the way she did. Anyone responsible for that awful day should be held accountable.

  
JOSEPH MUCARIA

Sworn to before me this  
12<sup>th</sup> day of June, 2022

  
Notary Public

EDWARD ARCHER  
Notary Public - State of New York  
NO. 01AR6348858  
Qualified in Queens County  
My Commission Expires Oct 11, 2024



## **Estate of Paul Murphy**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

JOHNN BASCI, et al.,

**AFFIDAVIT OF  
CAROL MURPHY**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK )

: SS.:

COUNTY OF KINGS )

CAROL MURPHY, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1134 79<sup>th</sup> Street, Brooklyn, New York 11228.

2. I am currently 56 years old, having been born on August 12, 1965.

3. I am the wife of Paul Murphy, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.

4. My husband passed away from cancers of the colon and appendix on January 4, 2018, at the age of 54. It was medically determined by the World Trade Center Health Program that these illnesses were causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On August 30, 2018, I was issued Letters Testamentary on behalf of my husband's estate by the Surrogate's Court of the State of New York, Kings County.

6. Paul and I were happily married. We met when we were both in our early 20s. We were married for almost 20 years when he became ill. Prior to his illness, we traveled

extensively and saw most of the world with our daughters. We were an active couple. We loved date nights and going to concerts. We went to the gym on a regular basis and went for long walks together. We had a great life.

7. My husband was a lieutenant in the New York City Police Department and a first responder to the attacks on the World Trade Center on 9/11. He worked 12 to 14 hour shifts at Ground Zero, 6 days a week, for 6 to 8 months after the attacks.

8. On September 8, 2011 our world was shattered. Paul had been to see a doctor and was diagnosed with pseudomyxoma peritonei, a rare form of colon cancer with no cure. In best case scenarios, there were surgeries that could be performed to extend a person's life, but they are grueling and come with many risks. Despite the risks, Paul elected to have this grueling 8 to 12-hour surgery. In fact, had to have this surgery twice. Paul also suffered through many bowel obstructions, which required surgery to remove. He had this surgery so many times that eventually it could no longer be performed due to the buildup of scar tissue. His disease was simply relentless and devastating.

9. Complications came along with many of the surgeries. Paul had to be fed intravenously for months on end. During these times, he could not eat any food by mouth. He also suffered from chronic pain and digestive problems. With each surgery and hospital visit, his health would dissipate a little bit more. My poor husband suffered this fate for almost 6-1/2 years.

10. Paul's illness was terminal from day one, but he didn't realize it at first. We thought his first major surgery was going to be the end, but it was actually just the beginning. As his illness progressed, Paul fell into a deep, dark depression. He also became cavalier and reckless. Understandably, he wanted to live as much as he could, but his illness prevented him from doing many things. He stopped disciplining our daughters because he didn't want to be the bad guy. He knew he was going to die. He just didn't know when. It was abundantly clear that Paul was frustrated and angry with his disease and its devastating effects.

11. My husband's illness was all-consuming and prolonged. It's hard to remember when he wasn't sick. His illness invaded every aspect of our lives, even intimate ones. During our most private moments, my hand would graze the Mediport in his chest, and we would be reminded that our life together was going to be cut short. Living with someone who knows

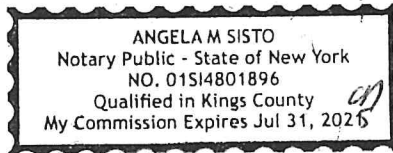
they're going to die is an experience all its own. You constantly have to watch what you say, and how you say it. And you don't dare speak about the future or make any plans for it.

12. It has now been four years since my husband passed away. The years of time that we should have had together were stolen from us. I am now heading into my late 50s and I am alone. All the hard work that Paul and I did so that we could enjoy our retirement and grow old together has been destroyed. He suffered so much, so needlessly. I still cry every day.

  
CAROL MURPHY

Sworn to before me this  
6<sup>th</sup> day of May, 2022

  
Notary Public



## **Estate of Milagros Ortiz**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

03-MDL-1570 (GBD)(SN)

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

-----X

JOHNN BASCI, et al,

**AFFIDAVIT OF  
MARIANO ORTIZ**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK )

: SS.:

COUNTY OF KINGS )

MARIANO ORTIZ, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 124 Maujer Street, Apt. 4C, Brooklyn, New York 11206.
2. I am currently 67 years old, having been born on April 30, 1955.
3. I am the husband of Milagros Ortiz, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my wife's estate.
4. Milagros passed away from colon cancer on March 9, 2013, at the age of 54. It has been medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. On January 30, 2014, I was issued Letters of Administration on behalf of my wife's estate by the Kings County, New York Surrogate's Court.



6. Milagros was a wonderful wife and mother to our seven children. She was always the center of attention at home because of her playful personality and humor. Milagros was very kindhearted and generous. If she saw someone in need, she would not hesitate to offer help. Everyone who knew Milagros respected her. It always amazed me how resilient she was. Nothing could bring her down. She was a rare human being, and I considered myself lucky to call her my wife.

7. On the day of the September 11<sup>th</sup> terrorist attacks, Milagros was working at Sunset Park in Brooklyn. Milagros and I both worked for the Department of Health. She was a supervisor. After Milagros and I found out about the attacks on the World Trade Center, we returned to our office where we witnessed the second tower fall to the ground. Milagros immediately started crying. It was a horrific and emotional moment for the both of us.

8. About a week after the attacks, Milagros' boss asked for volunteers to help clear the debris from Ground Zero. Milagros signed up right away. She went to Ground Zero eager to start working. Witnessing the destruction up close and working to clear the debris was emotionally and physically taxing for her. It was not long before Milagros was told to move to another location, where she started cleaning the stores and restaurants near Ground Zero. For a week, Milagros cleaned debris, removed rotten food from restaurants, and swept dust. She was so busy at work that she hardly had time to think about whether the air she was breathing or the food she was eating contained any harmful toxins.

9. Milagros and I both lost our jobs in 2011 due to budget cuts, so we struggled financially. A few years later, Milagros started experiencing stomach pain. Her movements were noticeably slower. She would get tired very easily. Milagros stopped driving her car, which was unusual because she always drove for our family.



10. With each passing day, Milagros was getting weaker and weaker. She was completely bedridden. She hardly ever ate. Her eyes had yellowed, and her hair started falling out. She had excruciating pain in her stomach and back. She was constipated and vomiting a lot. She lost a lot of weight. Milagros had no quality of life. Despite all of the pain she was enduring, Milagros stayed strong for me and our children. She did not want her friends and relatives to know that she was sick. She was constantly telling us that she would be okay.

11. Milagros finally agreed to see a doctor after much convincing. After we arrived at the hospital, the doctor could hardly find Milagros' pulse, so they rushed her to the emergency room. In February 2013, my children and I found out that Milagros had cancer. The doctor did not recommend chemotherapy because her cancer had already spread throughout her body and vital organs. There was nothing that could be done to save her life. About a month later, she passed away.

12. My children and I miss Milagros every day. She was a positive influence in our lives. There is nothing in this world that can replace what she meant to our family.

  
MARIANO ORTIZ

Sworn to before me this  
16<sup>th</sup> day of May, 2022

  
Notary Public

ANNY D BELTRE  
Notary Public - State of New York  
No. 01BE6401603  
Qualified in Kings County  
My Commission Expires Dec. 31, 2023

## **Estate of Michael Mustillo**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

JOHNN BASCI, et al.,

**AFFIDAVIT OF**  
**DORA MUSTILLO**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY )

: SS.:

COUNTY OF MIDDLESEX )

DORA MUSTILLO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 106 Lincoln Ave, Carteret New Jersey 07008.
2. My current age is 53, having been born on October 29, 1968.
3. I am the wife of Michael Mustillo, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.
4. My husband passed away from lung cancer on August 5, 2014, at the age of 48. It was medically determined by the World Trade Center Health Program that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. On September 25, 2014, I was appointed personal representative of my husband's estate by the Middlesex County, New Jersey Surrogate's Court.
6. Michael and I were married for twenty-two years. We were very involved with our children, especially their sports. My daughter was a dancer, and we used to travel a lot with her to dance competitions. Our kids played soccer, and we'd go to all their soccer games. We

were a happy family. We lived in the same house since we got married. We raised three children together. Things became much more difficult when Michael got sick. We couldn't travel like we used to or do as much as we wanted to.

7. Michael was an electrician for the Port Authority. Within hours after the attacks on 9/11/2001, he was called to start working at the World Trade Center. He was stationed at Jersey City and was called over to Manhattan, where he began work on the cleanup. He worked there for six months, working tons of overtime. He would work from 7:00 a.m. to 7:00 p.m. every day. I was eight months pregnant at the time. He was sad and depressed. Of course, the whole world was upset, but for Michael it hit particularly close to home. He used to come home all covered in white ash. I made him come in through the side door in the basement of our home, so he could wash his clothing separately. That dust, it probably was a little bit of everything from the towers—glass, concrete, and even human remains.

8. A few years after I had my daughter, Michael started to fall ill. At first, we thought it was just allergies. We took him to the doctors, who first diagnosed him with an autoimmune disease called scleroderma. From there, it only escalated. He had a constant dry cough that wouldn't go away. I knew something was wrong because he was losing weight rapidly, and he was a thin man to begin with. He was a healthy person who drank only on occasion. Michael regularly exercised and even set up our basement with weights. He dedicated his life to his family and work and was serious about his health. He made sure to go for biopsies with the World Trade Center Health Program. The first biopsy was negative, and a few years later he did another biopsy which was positive. Michael was diagnosed with Stage III lung cancer in early 2014.

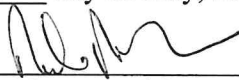
9. Michael suffered many symptoms of lung cancer. He was coughing all the time and had trouble swallowing. He would cough up the food that he ate, which always made me concerned that he was going to choke. Of course, he had weight loss, very bad weight loss. He had trouble catching his breath, and, toward, the end, he had to go on an oxygen tank. He even had to sleep with the oxygen tank on. If he took a few steps without his oxygen tank, he would be winded. The lung cancer also impacted his mental health. He became depressed because he was ill. He felt helpless, like he could do nothing to save himself. But he would try to go on with his normal day and keep himself occupied with our children. It was a sad time.

10. It was hard on our children. It was hard to explain to them what was going on. When he passed away, my youngest child was only twelve years old. My older son is autistic, and it was difficult to explain the situation to him as well.

11. Michael loved his family, his mother, his pets, and his wife and children. He was a very good man. It's saddening that this happened to us and our children. He told me at the end of his life that he knew he was going to die. What do you say to that? I told him, I'll be fine and that he should watch over us. Now, our youngest daughter is in college. She was only twelve years old when he died. I'm trying to make everything work. Life is not fair...you have to be stronger, and keep moving forward.

  
DORA MUSTILLO

Sworn to before me this  
16<sup>th</sup> day of May, 2022



Notary Public



**Estate of Daniel O'Sullivan**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

JOHNN BASCI, et al.,

**AFFIDAVIT OF**  
**TERI ROLDAN**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK     )  
                                  : SS.:  
COUNTY OF QUEENS     )

TERI ROLDAN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 35 West 13<sup>th</sup> Road, Broad Channel, New York 11693.

2. I am currently 37 years old, having been born on June 5, 1984.

3. I am the daughter of Daniel O'Sullivan, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my father's estate.

4. My father passed away from pancreatic cancer on February 25, 2017, at the age of 58. It was medically determined by the World Trade Center Health Program that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On May 4, 2017, I was issued Letters Testamentary on behalf of my father's estate by the Surrogate's Court of the State of New York, Queens County.

6. I am my father's daughter and an only child. It was just me and my father when I was growing up. My parents were divorced, so my dad was a single father. We spent a lot of time together. He was my softball coach, and he always took me into the city to see Broadway

shows and plays. We definitely had an excellent relationship. He was also a wonderful grandfather to my three children. I miss him a lot.

7. My father worked for the Department of Transportation. He was working in construction, helping build bridges over the pile for first responders. He worked at the site for months. My father described the scene as horrible. He said there was debris everywhere, and it was hard to breathe. He saw bodies and body parts strewn everywhere. He often cried when telling me how terrible it was. All he witnessed definitely affected his mental health, as well as his physical health. He developed PTSD as a result of his experience.

8. My father's mental health started to decline after 9/11. He was a lot more secluded and withdrawn. He wasn't as outgoing as he used to be. He spent more time alone, becoming socially awkward. He was sad more often than not, suffered from anxiety, and he wasn't his outgoing self. He also struggled with terrible nightmares.

9. In early 2017, my father started to not feel well. We took him to the hospital, where they ran some tests. He was diagnosed with stage IV pancreatic cancer almost immediately. I was shocked because he seemed like a generally healthy person. We didn't expect anything like this to happen. The cancer hit him like a ton of bricks.

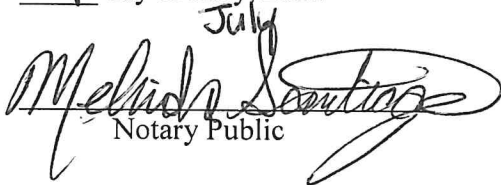
10. It was only 28 days from the date of his diagnosis to the day my father died. It was a whirlwind of emotions. We barely had time to accept any of it. It was the worst time of my life. His tumor was inoperable. He tried one round of infusion chemo, but it did nothing. He was a big man, 6'4" and over 200 pounds. The cancer whittled him away, so that by the time of his death he looked like a skeleton. He was jaundiced and couldn't move. It was horrible. He was visibly upset during his stay in the hospital. He wanted to live. He loved me and his grandkids, and he didn't want to leave us. He wanted to try every treatment he could to save his life, but there was just no saving him. When he left the hospital, the doctor told us that it could be a matter of days or even hours before he died. He survived only 24 hours after leaving the hospital.

11. My father wasn't finished living his life. He was so young, only 58 years old. His grandkids don't have other grandparents. I have two little boys who he should be here for. We

all miss him every day.

  
TERI ROLDAN

Sworn to before me this  
7 day of ~~May~~ <sup>July</sup>, 2022

  
Notary Public

MELINDA SANTIAGO  
NOTARY PUBLIC-STATE OF NEW YORK  
No. 01SA6403068  
Qualified in Queens County  
My Commission Expires 01-13-2024